

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	DATE FILED: _____
	:	
v.	:	CRIMINAL NO. _____
	:	
ISAISA SANCHEZ,	:	VIOLATION: 21 U.S.C. § 846
EDGARDO COLON,	:	(conspiracy to distribute more than
DEDMAS SANCHEZ,	:	1 kilogram of heroin - 1 Count)
a/k/a “Guimo,”	:	21 U.S.C. § 853
JOSE MIGUEL RIVERA, JR.,	:	(criminal forfeiture)
a/k/a “Pechu,”	:	
JOSE MIGUEL RIVERA, SR.,	:	
LUIS ANTONIO COLON,	:	
a/k/a “Menor,”	:	
OMAR CHINCHILLA,	:	
a/k/a “J.R.,”	:	
JAMES JULIA-COSME,	:	
a/k/a “Barbero,”	:	
JULIO MARTINEZ,	:	
EZEQUIEL RIVERA,	:	
a/k/a “Junior,”	:	
CARLOS ALEXANDER	:	
ORTIZ-CORTEZ,	:	
a/k/a “Surdo,”	:	
a/k/a “Ale,”	:	
WILLIAM MARTINEZ,	:	
a/k/a “Pito,”	:	
JULIAN ORTIZ,	:	
a/k/a “Blanco,”	:	
MIGUEL HERNANDEZ,	:	
a/k/a “Pito,”	:	
EDWARD SKOTARCZAK,	:	
a/k/a “Painter,” and	:	
ROBERTO GONZALEZ,	:	
a/k/a “Boriqua”	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From on or about a date unknown to the grand jury beginning at least in January 2002, through on or about the date of this indictment, at Allentown, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ISAISA SANCHEZ,
EDGARDO COLON,
DEDMAS SANCHEZ, a/k/a "Guimo,"
JOSE MIGUEL RIVERA, JR., a/k/a "Pechu,"
JOSE MIGUEL RIVERA, SR.,
LUIS ANTONIO COLON, a/k/a "Menor,"
OMAR CHINCHILLA, a/k/a "J.R.,"
JAMES JULIA-COSME, a/k/a "Barbero,"
JULIO MARTINEZ,
EZEQUIEL RIVERA, a/k/a "Junior,"
CARLOS ALEXANDER ORTIZ-CORTEZ, a/k/a "Surdo," a/k/a "Ale,"
WILLIAM MARTINEZ, a/k/a "Pito,"
JULIAN ORTIZ, a/k/a "Blanco,"
MIGUEL HERNANDEZ, a/k/a "Pito,"
EDWARD SKOTARCZAK, a/k/a "Painter," and
ROBERTO GONZALEZ, a/k/a "Boriqua,"**

conspired and agreed together, and with others known and unknown to the grand jury, to knowingly and intentionally distribute in excess of one kilogram, that is, more than 30 kilograms, of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and 841(b)(1)(A).

MANNER AND MEANS

It was a part of the conspiracy that:

2. Defendants **ISAISA SANCHEZ, EDGARDO COLON, DEDMAS SANCHEZ, JOSE MIGUEL RIVERA, JR., JOSE MIGUEL RIVERA, SR., LUIS**

ANTONIO COLON, OMAR CHINCHILLA, JAMES JULIA-COSME, JULIO MARTINEZ, EZEQUIEL RIVERA, CARLOS ALEXANDER ORTIZ-CORTEZ, WILLIAM MARTINEZ, JULIAN ORTIZ, MIGUEL HERNANDEZ, EDWARD SKOTARCZAK and ROBERTO GONZALEZ were members of the **SANCHEZ ORGANIZATION**, an organization that distributed heroin from various locations in and around the downtown area of Allentown, Pennsylvania.

3. Sometime prior to January 2002, defendants **ISAISA SANCHEZ and EDGARDO COLON** began to sell “bundled” heroin, which was prepackaged for individual sale on the street to customers. They began to purchase “loose” heroin by the gram or in larger quantities which they and others then broke down and packaged in individual user dosages to maximize their profit.

4. Defendants **ISAISA SANCHEZ and EDGARDO COLON** hired employees, who acted as “runners,” “managers,” and street dealers known as “workers.”

5. The **SANCHEZ ORGANIZATION** used at least three cellular telephones that heroin customers called to arrange drug sales. The telephones were pre-paid cellular telephones with no verifiable subscriber information. “Runners” distributed the phones to street dealers along with a supply of heroin. “Managers” coordinated the daily narcotics activity with overall direction provided by the organizational leadership, defendants **ISAISA SANCHEZ and EDGARDO COLON**. When a street dealer was arrested and the phone was confiscated, the number was simply transferred to a new cell phone by the next day. Each of these cell phones received thousands of calls per month.

6. The **SANCHEZ ORGANIZATION** employed a profit-sharing method of

heroin sales that tied compensation to the amount of heroin distributed. The **SANCHEZ ORGANIZATION**'s signature practice was the packaging of 14 ten-dollar bags of heroin in a "bundle." The 14-bag bundles exceeded the ten-bag bundles typically employed in the heroin trade in Allentown, Pennsylvania. The **SANCHEZ ORGANIZATION** was responsible for distributing approximately 50-60 bundles of heroin per day in Allentown, which was equivalent to 25-30 grams of heroin or nearly one kilogram per month. At times material to this conspiracy, a kilogram of heroin sold on a wholesale basis in Allentown for approximately \$60,000 to \$70,000. A kilogram of heroin was able to be repackaged into approximately 20,000 ten-dollar bags for retail sale to customers on the street, generating \$200,000 in revenue and an approximate profit of \$140,000 per kilogram of heroin.

7. Defendants **DEDMAS SANCHEZ and JOSE MIGUEL RIVERA, JR.** functioned as the managers of the **SANCHEZ ORGANIZATION**. As managers, they determined which members of the **SANCHEZ ORGANIZATION** should work as runners and workers, and coordinated the day-to-day delivery of cell phones and heroin, and the collection of drug proceeds on behalf of the organizational leadership, defendants **ISAISA SANCHEZ and EDGARDO COLON**.

8. Defendants **CARLOS ALEXANDER ORTIZ-CORTEZ, LUIS ANTONIO COLON, and JAMES JULIA-COSME** were runners in the **SANCHEZ ORGANIZATION**, who were responsible for the physical delivery of heroin supplies and cell phones to the workers and the delivery of proceeds to the managers.

9. Defendants **JOSE MIGUEL RIVERA, SR., OMAR CHINCHILLA, JULIO MARTINEZ, EZEQUIEL RIVERA, WILLIAM MARTINEZ, JULIAN ORTIZ,**

MIGUEL HERNANDEZ, EDWARD SKOTARCZAK and ROBERTO GONZALEZ were the workers of the **SANCHEZ ORGANIZATION**, who sold bags and bundles of heroin to customers.

10. Some members of the **SANCHEZ ORGANIZATION** held different positions with the organization at different times. On occasion, some members of the **SANCHEZ ORGANIZATION** performed more than one role. For instance, on three dates in or about September and October 2004, **LUIS ANTONIO COLON**, while working as a runner, also sold heroin to customers.

11. The workers for the **SANCHEZ ORGANIZATION** conducted their heroin sales in the downtown area of Allentown, Pennsylvania including the vicinity of 8th through 10th Streets on Green Street, 8th through 10th Streets on Washington Street, 10th through 14th Streets on Chew Street, and Front and Allen Streets. Workers provided their cell phone numbers to customers so the customers could notify the workers when they wanted to purchase heroin. When the workers received calls from the customers, the workers provided the customers with the location and time to meet them to complete the transactions. The runners and the managers kept their supplies of heroin at “stash houses” nearby the sales locations, including, but not limited to, 1326 Chew Street, known as “the Castle,” and 602 N. Front Street, known as “the Cave,” in Allentown.

12. On or about May 29, 2004, defendant **ISAISA SANCHEZ** and a female companion were shot while leaving an Allentown delicatessen. **SANCHEZ** provided false identification to medical personnel and did not formally report the incident to police or cooperate in the investigation. Following that shooting, **SANCHEZ** moved to the Camden, New Jersey area

to recuperate, and remained in telephone contact with the managers of the **SANCHEZ ORGANIZATION**.

13. Various members of the **SANCHEZ ORGANIZATION** possessed firearms in furtherance of the heroin distribution conspiracy. For example, on or about June 13, 2004, defendant **EDGARDO COLON** possessed a handgun inside 216 N. Fulton Street in Allentown. Inside the premises, leased by co-defendant **ISAISA SANCHEZ, COLON** and co-defendant **JOSE MIGUEL RIVERA, JR.** also possessed large amounts of drug packaging materials used specifically for the packaging of heroin, three additional firearms, one of which was stolen, 2,400 unused waxed lined baggies, 12,000 clear plastic baggies, heat sealers, surgical masks, a digital scale, measuring spoons, ink stamps and pads, Ziploc baggies, approximately 100 rounds of ammunition, varying in caliber, and \$10,310 in cash.

14. At times material to the conspiracy, **ISAISA SANCHEZ, EDGARDO COLON, DEDMAS SANCHEZ, JOSE MIGUEL RIVERA, JR., JOSE MIGUEL RIVERA, SR., LUIS ANTONIO COLON, OMAR CHINCHILLA, JAMES JULIA-COSME, JULIO MARTINEZ, EZEQUIEL RIVERA, CARLOS ALEXANDER ORTIZ-CORTEZ, WILLIAM MARTINEZ, JULIAN ORTIZ, MIGUEL HERNANDEZ, EDWARD SKOTARCZAK, ROBERTO GONZALEZ**, and others known and unknown to the grand jury, possessed and used pagers, cellular telephones, and residence telephones to communicate with one another regarding the sale of heroin.

OVERT ACTS

In furtherance of the conspiracy, the defendants, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania, and elsewhere:

1. On or about January 25, 2002, defendant **MIGUEL HERNANDEZ** possessed approximately .98 grams of heroin that he intended to sell for the **SANCHEZ ORGANIZATION**.

2. On or about May 11, 2004:

- (a) Person #1 known to the grand jury spoke by telephone with defendant **JAMES JULIA-COSME** and arranged a meeting with **JULIA-COSME** for the purpose of getting **JULIA-COSME** to hire Person #1 as a worker for the **SANCHEZ ORGANIZATION**.
- (b) When defendant **JULIA-COSME** met with Person #1, he hired Person #1 as a worker and gave Person #1 approximately 3.12 grams of heroin and a telephone.
- (c) Later the same day, Person #1 telephoned defendant **JULIA-COSME** and made arrangements to meet him for the purpose of giving him the proceeds of Person #1's heroin sales.
- (d) Defendant **JULIAN ORTIZ** physically retrieved the money from Person #1.

3. On or about July 14, 2004:

- (a) Defendant **MIGUEL HERNANDEZ** telephoned defendant **EDGARDO**

COLON seeking to resume his prior duties as a worker selling heroin for the **SANCHEZ ORGANIZATION**.

(b) Defendant **MIGUEL HERNANDEZ** possessed a small amount of heroin, which he threw from his vehicle when attempting to flee police.

4. On or about September 10, 2004, after receiving a telephone call, defendant **LUIS ANTONIO COLON** sold approximately 3.1 grams of heroin to a customer of the **SANCHEZ ORGANIZATION**.

5. On or about September 22, 2004, after receiving a telephone call, defendant **LUIS ANTONIO COLON** sold approximately 3.1 grams of heroin to a customer of the **SANCHEZ ORGANIZATION**.

6. On or about October 12, 2004, after receiving a telephone call, defendant **LUIS ANTONIO COLON** sold approximately 3.4 grams of heroin to a customer of the **SANCHEZ ORGANIZATION**.

7. On or about November 23, 2004, after receiving a telephone call, defendants **OMAR CHINCHILLA and JULIO MARTINEZ** sold approximately 2.6 grams of heroin to a customer of the **SANCHEZ ORGANIZATION**.

8. On or about November 24, 2004, defendant **EZEQUIEL RIVERA** possessed approximately 1.9 grams of heroin and a **SANCHEZ ORGANIZATION** cell phone.

9. On or about December 1, 2004, defendant **JULIO MARTINEZ**, who was in the company of defendant **JAMES JULIA-COSME**, possessed approximately 1.30 grams of heroin that was packaged in two 14-bag bundles and a **SANCHEZ ORGANIZATION** telephone.

10. On or about December 11, 2004, defendant **LUIS ANTONIO COLON** engaged in a telephone conversation with **JAMES JULIA-COSME**, who stated that **JULIA-COSME** had enough bagged heroin, but was looking for an additional unbagged gram of heroin. **COLON** agreed to provide **JULIA-COSME** with the additional heroin at a stash location known as “the Cave.”

11. On or about December 14, 2004, defendants **JAMES JULIA-COSME** and **OMAR CHINCHILLA** spoke by telephone and stated that because they could not reach defendant **LUIS ANTONIO COLON** to be resupplied with additional heroin, they planned to complain about **COLON** to defendant **JOSE MIGUEL RIVERA, JR.**, a manager in the **SANCHEZ ORGANIZATION**.

12. On or about December 14, 2004, a customer known to the grand jury spoke by telephone with defendant **OMAR CHINCHILLA**, who arranged to meet the customer at Walgreen’s drug store parking lot at 17th & Tilghman Streets in Allentown. Defendants **CHINCHILLA** and **JAMES JULIA-COSME** and an unidentified third individual drove to the Walgreen’s, where **JULIA-COSME** sold approximately 3.4 grams of heroin to the customer that **CHINCHILLA** had spoken to on the telephone.

13. On or about December 26, 2004, defendant **LUIS ANTONIO COLON** spoke by telephone with defendant **JAMES JULIA-COSME** and stated that he was angry because he felt that defendant **CARLOS ALEXANDER ORTIZ-CORTEZ** was saying unfavorable things to **JOSE MIGUEL RIVERA, JR.** about **COLON** and the way he was conducting himself in the **SANCHEZ ORGANIZATION**’s narcotics operations. Defendants **COLON** and **JULIA-COSME** also discussed their belief that defendant **ORTIZ-CORTEZ**

presented a threat to **COLON** because he wanted **COLON** out of the business so that he could make more money.

14. On or about December 28, 2004, after a customer known to the grand jury spoke by telephone with defendant **OMAR CHINCHILLA**, **CHINCHILLA** sold approximately .50 grams of heroin to the customer.

15. On or about December 30, 2004, defendant **DEDMAS SANCHEZ** spoke by telephone with defendants **JAMES JULIA-COSME** and **OMAR CHINCHILLA**. **SANCHEZ** directed them to train a new worker and promoted **JULIA-COSME** by allowing him to have his own telephone and customer base to sell heroin. **SANCHEZ** also stated that he had directed defendants **LUIS ANTONIO COLON** and **CARLOS ALEXANDER ORTIZ-CORTEZ** to provide **JULIA-COSME** with the new telephone.

16. On or about January 9, 2005, defendant **WILLIAM MARTINEZ** spoke by telephone with a heroin customer known to the grand jury, during which the customer said he needed four bags of heroin and **MARTINEZ** agreed to meet him at Penn and Washington Streets in Allentown.

17. On or about January 11, 2005, defendant **JOSE MIGUEL RIVERA, JR.**, spoke by telephone with defendant **JAMES JULIA-COSME** and stated that he had found drug packaging different from the drug packaging routinely used by the **SANCHEZ ORGANIZATION** in a bag of money turned over as drug proceeds the previous day. **RIVERA, JR.** demanded to know the origin of the foreign packaging and he told **JULIA-COSME** to have defendant **OMAR CHINCHILLA** call **RIVERA, JR.** to explain the different packaging.

18. On or about January 16, 2005, defendant **WILLIAM MARTINEZ** spoke

by telephone with defendant **JOSE MIGUEL RIVERA, JR.** and stated that defendant **JAMES JULIA-COSME** and **MARTINEZ** had arranged to meet **RIVERA, JR.** at the **SANCHEZ ORGANIZATION** stash location known as “the Castle,” when they needed to be re-supplied with heroin.

19. On or about January 25, 2005, defendant **EDWARD SKOTARCZAK** received a telephone call from a customer unknown to the grand jury seeking to purchase twenty bundles of heroin. **SKOTARCZAK** then spoke by telephone with defendant **ROBERTO GONZALEZ** and, after **GONZALEZ** told **SKOTARCZAK** to tell the customer to meet them at 9th and Washington Streets in Allentown, **SKOTARCZAK** relayed that information to the customer.

20. On or about January 25, 2005, defendant **ROBERTO GONZALEZ** received a telephone call from a heroin customer from Bethlehem, Pennsylvania seeking to purchase “ten” or “twenty” bundles of heroin because there was no heroin available in Bethlehem. **GONZALEZ** told the individual to call him again when he arrived at 9th and Washington Streets in Allentown. **GONZALEZ** then called defendant **JOSE MIGUEL RIVERA, JR.** and expressed concern over selling a large amount of heroin to an unknown customer, fearing the involvement of law enforcement. **GONZALEZ** provided **RIVERA, JR.** with the customer’s telephone number and told **RIVERA, JR.** that he, **GONZALEZ**, would follow **RIVERA, JR.’s** instructions.

21. On or about January 29, 2005, defendants **JAMES JULIA-COSME** and **JULIAN ORTIZ** spoke by telephone and **ORTIZ** informed **JULIA-COSME** that he was with a heroin customer at 7th and Washington Streets in Allentown. **ORTIZ** told **JULIA-COSME** that he had spoken to

defendants **CARLOS ALEXANDER CORTEZ-ORTIZ** and **LUIS ANTONIO COLON**.

ORTIZ also told **JULIA-COSME** that he was in possession of a supply of heroin that was from a different source than they had used previously, but it was good quality. 22. On or about January 29, 2005, defendant **JAMES JULIA-COSME** spoke by telephone with an unknown male stating that the **SANCHEZ ORGANIZATION** was angry about someone selling heroin in their area of operations and they were planning to attack that individual and “send him to hell.” 23. On or about

February 1, 2005, defendant **JOSE MIGUEL RIVERA, JR.** spoke by telephone with defendant **JAMES JULIA-COSME** and stated that **RIVERA, JR.** was directing **JULIA-COSME** to attack an individual outside the **SANCHEZ ORGANIZATION** who was selling heroin in the area controlled by the **SANCHEZ ORGANIZATION**. 24. On or about

February 18, 2005, defendant **JOSE MIGUEL RIVERA, JR.** spoke by telephone with his father, defendant **JOSE MIGUEL RIVERA, SR.**, during which **RIVERA, JR.** asked **RIVERA, SR.** whether defendants **JAMES JULIA-COSME** and **EZEQUIEL RIVERA** had met with **RIVERA, SR.** **RIVERA, SR.** responded that **EZEQUIEL RIVERA** and **JULIA-COSME** each took “four” bundles of heroin and **EZEQUIEL RIVERA** gave **RIVERA, SR.** “five” (\$500.00) and **JULIA-COSME** gave him “eight” (\$800.00) which **RIVERA, SR.** said he would bring to **RIVERA, JR.** 25. On or about February 18, 2005,

defendant **ISAISA SANCHEZ** spoke by telephone with defendant **JOSE MIGUEL RIVERA, JR.**, during which **SANCHEZ** discussed a problem he was having with one of the **SANCHEZ ORGANIZATION**’s telephones used to sell heroin to customers. **RIVERA** assured **SANCHEZ** that customers could still reach the workers selling heroin by calling the phone used by defendant

JAMES JULIA-COSME. ISAISA SANCHEZ told **RIVERA** that he had heroin available for him and for defendant **DEDMAS SANCHEZ** and the heroin was an excellent quality that was very popular among **ISAISA SANCHEZ**'s drug customers in New Jersey.

26. On or about February 19, 2005, defendant **ISAISA SANCHEZ** spoke by telephone with defendant **JOSE MIGUEL RIVERA, JR.** during which **RIVERA, JR.** reported to **SANCHEZ** that defendant **EZEQUIEL RIVERA** had sold 52 bundles and they were waiting on the new heroin supply. **RIVERA, JR.** also told **SANCHEZ** that he had observed the police following him. **SANCHEZ** advised **RIVERA, JR.** to change vehicles to avoid detection by the police.

27. On or about February 21, 2005, defendant **JAMES JULIA-COSME** possessed approximately 3.2 grams of heroin packaged in 67 ten-dollar bags and two cellular "street phones" used by the **SANCHEZ ORGANIZATION** to arrange heroin sales.

28. On or about February 21, 2005, after the arrest of defendant **JAMES JULIA-COSME**, defendant **JOSE MIGUEL RIVERA, JR.** spoke by telephone with defendant **DEDMAS SANCHEZ** about the arrest and discussed how to alter their business operations in the aftermath of the arrest. **RIVERA, JR.** stated that he had warned **JULIA-COSME** and others to avoid the area where the arrest occurred, as they had already overused the area. **SANCHEZ** then spoke by telephone with defendant **CARLOS ALEXANDER ORTIZ-CORTEZ** and stated that **RIVERA, JR.** had told the other workers to wait before they go back out on the street. **SANCHEZ** then discussed with **ORTIZ-CORTEZ** the need to obtain new phones and phone cards and told **ORTIZ-CORTEZ** that he should just use a phone they already had and that two or three other phones could be found laying around

“the Castle.”

All in violation of Title 21, United States Code, Section 846.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 21, United States Code, Sections 846, as set forth in Count One, defendants

**ISAISA SANCHEZ,
EDGARDO COLON,
DEDMAS SANCHEZ, a/k/a “Guimo,”
JOSE MIGUEL RIVERA, JR., a/k/a “Pechu,”
JOSE MIGUEL RIVERA, SR.,
LUIS ANTONIO COLON, a/k/a “Menor,”
OMAR CHINCHILLA, a/k/a “J.R.,”
JAMES JULIA-COSME, a/k/a “Barbero,”
JULIO MARTINEZ,
EZEQUIEL RIVERA, a/k/a “Junior,”
CARLOS ALEXANDER ORTIZ-CORTEZ, a/k/a “Surdo,” a/k/a “Ale,”
WILLIAM MARTINEZ, a/k/a “Pito,”
JULIAN ORTIZ, a/k/a “Blanco,”
MIGUEL HERNANDEZ, a/k/a “Pito,”
EDWARD SKOTARCZAK, a/k/a “Painter,” and
ROBERTO GONZALEZ, a/k/a “Boriqua,”**

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, the following property:

1. All property constituting, or derived from, any proceeds the defendants obtained, directly or indirectly, as the result of such violation, including but not limited to: \$4,000,000 in United States currency, including \$10,310 seized from 216 N. Fulton Street in Allentown on June 13, 2004.

2. All property of the defendants which was used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, these violations, including but not limited to:

- a. One Ruger .357 revolver Model GP100, serial number 173-10671.
- b. One Ruger .40 caliber semi-automatic handgun, Model P94, serial number 341-21264.
- c. One Smith & Wesson .40 semi-automatic handgun, Model 4013, serial number VCU2762.
- d. One Sig Arms .357 caliber, semi-automatic handgun, Model SP2340, serial number SP0020931.

SUBSTITUTE ASSETS

If any of the property described above as being subject to forfeiture, as a result of any act or omission of:

ISAISA SANCHEZ,
EDGARDO COLON,
DEDMAS SANCHEZ, a/k/a "Guimo,"
JOSE MIGUEL RIVERA, JR., a/k/a "Pechu,"
JOSE MIGUEL RIVERA, SR.,
LUIS ANTONIO COLON, a/k/a "Menor,"
OMAR CHINCHILLA, a/k/a "J.R.,"
JAMES JULIA-COSME, a/k/a "Barbero,"
JULIO MARTINEZ,
EZEQUIEL RIVERA, a/k/a "Junior,"
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WILLIAM MARTINEZ, a/k/a "Pito,"
JULIAN ORTIZ, a/k/a "Blanco,"
MIGUEL HERNANDEZ, a/k/a "Pito,"
EDWARD SKOTARCZAK, a/k/a "Painter," and
ROBERTO GONZALEZ, a/k/a "Boriqua,"

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek, up to the value of the above forfeitable property, forfeiture of any other property of the defendants.

All pursuant to Title 21, United States Code, Section 853.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney